

DEC 17 1999

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

JAN 11 2000

In the Matter of)

) MURs 4389 and 4652

James ("Jim") Toledano)

EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

I. ACTION RECOMMENDED

Authorize the Office of the General Counsel to file a civil suit for relief in U.S. District Court.

II. BACKGROUND

On August 17, 1999, the Commission found probable cause to believe that James Toledano violated 2 U.S.C. § 432(b). The finding was based on Mr. Toledano's failure to forward a \$10,000 contribution to the treasurer of the Orange County Democratic Central Committee as required by law.

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As the Commission has signaled a strong interest in pursuing Mr. Toledano for the
 Section 432(b) violation,

this Office recommends that the Commission authorize the General Counsel
 to file suit for relief in U.S. District Court.

III. RECOMMENDATIONS

1. Authorize the Office of the General Counsel to file a civil suit for relief in U.S. District Court against James Toledano.
2. Approve the appropriate letters.

Date

12/17/99

Lawrence M. Noble
 General Counsel

Staff Assigned: Eugene H. Bull

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